

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS )  
 ) MDL No. 2738

## MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION

)  
) MDL No. 2738

) **NOTICE OF MOTION TO SEAL  
CERTAIN PORTIONS OF  
PLAINTIFFS' STEERING  
COMMITTEE'S OBJECTION TO  
SPECIAL MASTER'S LETTER  
OPINION ON DEFENDANT  
IMERYS TALC AMERICA, INC.'S  
CLAWBACK REQUEST OF  
EMPLOYEE EMAILS**

TO: All Counsel of Record

## COUNSEL:

PLEASE TAKE NOTICE that on a date that may be determined by the Court, the undersigned, counsel for defendant Imerys Talc America, Inc. (“Defendant”), shall move before the District Court of New Jersey Trenton Division, for an Order sealing certain portions of Plaintiffs’ Steering Committee’s Objection to Special Master’s Letter Opinion on Defendant Imerys Talc America, Inc.’s Clawback Request of Employee Emails.

PLEASE TAKE FURTHER NOTICE that Defendant will rely upon the attached Brief and Certification of Mark K. Silver, Esq. submitted herewith in support of this motion.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 1:6-2, Defendant hereby requests oral argument in the event that this motion is opposed.

**COUGHLIN DUFFY LLP**  
*Attorneys for Defendant Imerys Talc America, Inc.*

/s/ Mark K. Silver  
Mark K. Silver, Esq.

Dated: December 4, 2018

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system and is available for viewing and downloading from the CM/ECF system. The forgoing document was served upon all counsel of record via the CM/ECF system on this 4th day of December, 2018.

COUGHLIN DUFFY LLP  
*Attorneys for Defendant Imerys Talc America, Inc.*

*/s/ Mark K. Silver*  
Mark K. Silver, Esq.